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1                   Sayers

2     Q.   When specifically, if you recall, did

3   you discard the documents that you no longer have

4   that were in your home?

5     A.   Probably a couple decades ago.

6     Q.   Did you indicate on direct examination

7   that chrysotile was identical to talc?

8     A.   Chemically they are identical. They are

9   a magnesium luminosilicate.

10    Q.   Do you work with talc now?

11    A.   No, not at all.

12    Q.   Are you familiar with any of the --

13   strike that.

14           Are you familiar with applications to

15   which Calidria was put other than paper

16   manufacturing?

17    A.   Yes.

18    Q.   Did you ever become aware of Calidria

19   being used as a product in any rust proofing or car

20   body sealing products?

21    A.   Yes, I do recall an under seal

22   application.

23    Q.   Do you know whether or not Calidria was

24   used as an ingredient in a commercially available

25   under seal application?

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2     A.   I'm not sure whether it was commercial.

3     Q.   Tell me what it is that you know about

4   that.

5     A.   There were some experiments in the early

6   days where under seals were thickened by the

7   thixotropic property of asbestos.

8     Q.   How is it that you know that?

9     A.   I'm not sure, to be honest with you.

10    Q.   And where were the experiments

11   conducted?

12    A.   I'm not too sure of that either.

13    Q.   Do you know if they were conducted in

14   the United States as opposed to Europe?

15    A.   I couldn't be categoric.

16    Q.   Do you know whether or not the under

17   seal that you just referred to was -- if one of the

18   purposes of it was a rust-proofing product?

19    A.   An under seal is a rust-prevention

20   product. Rust proofing to an English person means

21   something different.

22    Q.   Just generally, was part of the purpose

23   of it to inhibit --

24    A.   To prevent.

25    Q.   -- production of rust?

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2     A.   Yes, yes.

3     Q.   Fair enough.

4           Do you know what visvestos is,

5   V-I-S-V-E-S-T-O-S?

6     A.   No.

7     Q.   Do you know what super visvestos is?

8     A.   No, never heard it.

9     Q.   I'm referring to your report. I think

10   it's the second paragraph, if I remember correctly.

11   It's on paragraph 1, which is on page 4,

12   Mr. Sayers.

13    A.   Yes.

14    Q.   Third paragraph down says, "Carbide's

15   replies have been based upon the two communications

16   sent from New York office on March 22nd, '66, and

17   October 7th of '66."

18    A.   Yes.

19    Q.   Have you ever seen either of those

20   documents?

21    A.   I've seen the former, the first one.

22    Q.   That is, the March?

23    A.   I saw both of them when I wrote the

24   report, but lately I've only seen the first.

25    Q.   Do you know what the October 7th, 1966,

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2   communication from the New York office said, by

3   chance?

4     A.   Not specifically, no.

5     Q.   Do you know what it said generally?

6     A.   No.

7     Q.   Do you know who the author was?

8     A.   No.

9     Q.   Do you know who the recipient was?

10    A.   No.

11    Q.   You seem to indicate you know something

12   about the aerodynamic flow of fiber or particles.

13   At least that's the impression I got. Do you

14   profess to have some knowledge of the aerodynamic

15   properties of either fiber or particles?

16    A.   Only from what I have read at the time.

17    Q.   When you say "only to what I have read,"

18   are you referring to only what you had read prior

19   to doing your report?

20    A.   That is right.

21    Q.   Have you learned anything about the

22   aerodynamic properties of fibers or particles since

23   1967?

24    A.   No, I haven't.

25    Q.   Do you know whether or not -- what